

FILED IN DISTRICT COURT
OKMULGEE COUNTY, OKLA
OKMULGEE DIVISION

IN THE DISTRICT COURT OF OKMULGEE COUNTY
STATE OF OKLAHOMA

JUL 21 2016

Terry Bratt,)
)
Plaintiff,)
)
Vs.)
)
Deco Security Services, Inc.)
)
Defendant,)

LINDA BEAVER, COURT CLERK
By _____ Deputy

Case No. CJ-2016- 121
Judge: _____

PETITION

Comes now the Plaintiff, Terry Bratt, by and through the undersigned counsel, and for his claim against the Defendant alleges and states and follows:

1. Plaintiff was employed by the Defendant from approximately December 2012, to November 2015.
2. That while employed by the Defendant the Defendant deducted from Plaintiff's paycheck payments that were initially for the purposes of making health insurance premium payments on behalf of the Plaintiff.
3. That Plaintiff notified Defendant that he had a qualifying health insurance because of previous employment with the State of Oklahoma and further notified Defendant that it should not be deducting health insurance premiums from Plaintiff's checks.
4. That Defendant notified Plaintiff that despite his objection to the deductions being made by the Defendant deductions would continue to be made from Plaintiff's checks but that said deductions would be placed into a 401K for the Plaintiff's benefit.
5. That Defendant Deco Security Services, Inc., ultimately lost a contract to provide security services at the location Plaintiff worked so Plaintiff's employment was terminated and he applied for and was hired by the new contracting company.
6. That Bratt has repeatedly sought to have the funds deducted from his paychecks and allegedly paid into the Deco 401K account transferred to the 401K of his new employer however Plaintiff was notified by Defendant that he had no funds deposited into the Deco 401K account.

7. That Plaintiff is entitled to an accounting for and refund of all funds deducted from his paycheck for health insurance and/or 401k deposits and is further entitled to a refund of all principal, lost interest, fees and costs including attorney fees.

8. That Plaintiff is entitled to demands exemplary damages.

Wherefore, Plaintiff respectfully prays for judgment against the Defendant for compensatory damages in an amount in excess of \$10,000.00, further prays for exemplary damages in excess of \$10,000.00 and further prays for all costs and fees, including attorney fees, and such other relief as the Court deems appropriate.

Respectfully submitted,

STEVE MONEY LAW, PLLC.
Original Signed By
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